

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

Filed

JUL 19 2017

United States of America
v.
Gonzalo Nicolas De La Fuente
and
Alejandro Boynak

U.S. Magistrate Judge

Case No.

3:17-mj-565-FKB

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 17, 2016 in the county of Lauderdale in the
Southern District of Mississippi, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 472 and 2

possession of counterfeit currency with intent to defraud

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.


Complainant's signature

Scott Frazier, United States Secret Service

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/19/2017


Judge's signature

City and state: Jackson, Mississippi

F. Keith Ball, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, A. Scott Frazier, (hereinafter referred to as Affiant), Special Agent of the United States Secret Service, being duly sworn, hereby depose and state as follows:

I am a Special Agent of the United States Secret Service (USSS) and have been so employed for over sixteen years. As part of my law enforcement duties, I am statutorily charged with investigating criminal cases, including those involving the manufacturing, possession and passing of counterfeit currency.

Based upon the information obtained as a result of this investigation, there is probable cause to believe **Gonzalo N. De La Fuente** and **Alejandro G. Boynak** together with others known and unknown, did knowingly together possess counterfeit currency with intent to defraud which is prohibited by Section 472, Title 18, United States Code.

Because this affidavit is being submitted for the limited purposes of securing a complaint and arrest warrant for these individuals, I have not included each and every fact known to me or other law enforcement officers concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that violations of the aforementioned statutes have occurred. The facts set forth in this affidavit are based on my own personal experience and training; discussions I have had with other agents and law enforcement officers; witness statements; and my review of reports, records and other evidence.

FACTS OF THE CASE

On July 17, 2017, Meridian Police Department received a call for service at Wal-Mart, located at 2400 N. Highway 19, Meridian, Mississippi, regarding two (2) Hispanic males utilizing counterfeit \$100 Federal Reserve Notes. Wal-Mart loss prevention was able to identify two (2) subjects via video surveillance enter the Wal-Mart store within one (1) minute of each other and go in different directions inside the store. These two individuals conducted a total of four (4) sales transactions at four (4) different sales terminals utilizing counterfeit \$100 Federal Reserve Notes.

These two (2) individuals were later identified as **Gonzalo De La Fuente** and **Alejandro Boynak**. Both **De La Fuente** and **Boynak** are citizen nationals of Argentina and were admitted into the United States on non-immigrant visa (B-2 Visitor for pleasure).

Alejandro Boynak's first purchase occurred at 16:42 where he purchased an item for \$5.22 and paid with a counterfeit \$100 Federal Reserve Note. **Boynak** received \$94.78 in change.

Boynak's second purchase occurred at 16:46, at a second sales terminal, where he purchased an item for \$4.90 and paid with a counterfeit \$100 Federal Reserve Note. **Boynak** received \$95.88 in change.


Boynak's third charge occurred at 16:53 at a third sales terminal, where he purchased an item for \$5.35 and again paid with a counterfeit \$100 Federal Reserve Note and 35 cents. **Boynak** received a total of \$95.00 in change.

Gonzalo De La Fuente attempted one purchase at the Wal-Mart Pharmacy counter where the total amount was \$3.92 and paid with a \$100 FRN. During the transaction, a loss prevention officer noted the \$100 Federal Reserve Note did not appear to be genuine, at which time, loss prevention notified the Meridian Police Department and attempted to keep **De La Fuente** inside the store. Wal-Mart loss prevention in Meridian had received an alert that two Hispanic males matching the description of **De La Fuente** and **Boynak** had been passing counterfeit United States currency at numerous Wal-Mart stores.

De La Fuente exited Wal-Mart and was followed by loss prevention. Officers from the Meridian Police Department arrived on the scene and arrested **Boynak** and **De La Fuente**, who had arrived at the Wal-Mart in the same vehicle. Officers from the Meridian Police Department determined that **Boynak** successfully passed three (3) counterfeit \$100 Federal Reserve Notes and **De La Fuente** attempted to pass one (1) counterfeit \$100 Federal Reserve Note.

On July 18, 2017, the Affiant examined the suspected counterfeit \$100 Federal Reserve Notes and determined these notes were not genuine currency.

Based on the foregoing, I respectfully submit that probable cause exists for an arrest warrant for **Gonzalo De La Fuente** and **Alejandro Boynak** for possession of counterfeit United States currency with intent to defraud and for aiding and abetting one another, all violation of 18 U.S.C. §§472 and 2.



A. Scott Frazier
Special Agent
United States Secret Service

Sworn and subscribed before me, this the 19th day of July, 2017.



Honorable F. Keith Ball
United States Magistrate Judge